

FOLEY & LARDNER LLP

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*Counsel for the Debtor
and Debtor in Possession***UNITED STATES BANKRUPTCY COURT****NORTHERN DISTRICT OF CALIFORNIA****OAKLAND DIVISION**

In re:

THE ROMAN CATHOLIC BISHOP OF
OAKLAND, a California corporation sole,

Debtor.

Case No. 23-40523 WJL

Chapter 11

**COVER SHEET TO SIXTH INTERIM FEE
APPLICATION OF ALVAREZ & MARSAL
NORTH AMERICA, LLC FOR
ALLOWANCE AND PAYMENT OF
COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD OF
JANUARY 1, 2025 THROUGH APRIL 30,
2025**

Judge: Hon. William J. Lafferty

Date: August 13, 2025

Time: 10:30am PT

Place: United States Bankruptcy Court
1300 Clay Street
Courtroom 220
Oakland, CA 94612

Objection Deadline: July 7, 2025

Name of Firm:	Alvarez & Marsal
Name of Client:	The Roman Catholic Bishop of Oakland
Time Period covered by this application:	January 1 – April 30, 2025
Total compensation sought this period:	\$71,110.00
Total expenses sought this period:	\$331.50
Petition date:	May 8, 2023
Retention date:	Effective as of May 8, 2023
Date of order approving employment:	July 1, 2023 [Dkt. No. 191]
Total fees approved by interim order to date:	\$4,837,730.12 ⁽¹⁾
Total expenses approved by interim order to date:	\$55,784.51
Total allowed fees paid to date:	\$4,894,618.12
Total allowed expenses paid to date:	\$56,116.01
Blended rate in this application for all timekeepers:	\$1,349.34
Fees sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$36,498.00
Expenses sought in this application already paid pursuant to a monthly fee statement but not yet allowed:	\$318.07
Number of professionals included in this application:	3
If applicable, number of professionals in this application not included in staffing plan approved by client:	N/A
If applicable, difference between fees budgeted and compensation sought for this period:	N/A
Number of professionals billing fewer than 15 hours to the case during this period:	2
Are any rates higher than those approved or disclosed at retention? If yes, calculate and disclose the total compensation sought in this application using the rates originally disclosed in the retention application:	No
Interim or Final:	Interim

⁽¹⁾ Total fees approved by interim order to date reflects Voluntary Reduction of \$75,000.00 per the *Order Granting First Interim Fee Application of Alvarez & Marsal North America, LLC* [Dkt No. 626] and Voluntary Reduction of \$13,172.38 per the *Order Granting Second Interim Fee Application of Alvarez & Marsal North America, LLC* [Dkt No. 1008]

SUMMARY OF MONTHLY FEE STATEMENTS FOR THE INTERIM FEE PERIOD

Date Filed & Docket	Period Covered	Total Compensation and Expenses Incurred		Total Amount Previously Requested with Prior Monthly Fee Statement		Total Amount Paid to Date		Holdback Fees Requested (20%)
		Fees	Expenses	Fees (80%)	Expenses (100%)	Fees (80%)	Expenses (100%)	
3/28/2025; Dkt. 1849	1/1/2025- 2/28/2025	45,622.50	318.07	36,498.00	318.07	36,498.00	318.07	9,124.50
5/30/2025; Dkt. 2015	3/1/20204- 4/30/2025	25,487.50	13.43	20,390.00	13.43	-	-	5,097.50
Total for Fee Application	1/1/2025- 4/30/2025	71,110.00	331.50	56,888.00	331.50	36,498.00	318.07	14,222.00

Summary of Any Objections to Monthly Fee Statements: N/A

Compensation and Expenses Sought in this Interim Application Not Yet Paid: **\$34,625.43**

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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re:

THE ROMAN CATHOLIC BISHOP OF
OAKLAND, a California corporation sole,

Debtor.

Case No. 23-40523 WJL

Chapter 11

**SIXTH INTERIM FEE APPLICATION OF
ALVAREZ & MARSAL NORTH AMERICA,
LLC FOR ALLOWANCE AND PAYMENT OF
COMPENSATION AND REIMBURSEMENT
OF EXPENSES FOR THE PERIOD OF
JANUARY 1, 2025 THROUGH APRIL 30, 2025**

Judge: Hon. William J. Lafferty

Date: August 13, 2025

Time: 10:30am PT

Place: United States Bankruptcy Court
1300 Clay Street
Courtroom 220
Oakland, CA 94612

Objection Deadline: July 7, 2025

1 Alvarez & Marsal North America, LLC (“A&M” or the “Firm”), as restructuring advisor to The
2 Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession
3 (the “Debtor” or “RCBO”),¹ respectfully submits this sixth interim application for allowance of
4 compensation and reimbursement of actual and necessary expenses (the “Interim Application”) for
5 services performed as restructuring advisor to the Debtor for the period of January 1, 2025 through April
6 30, 2025 (the “Interim Fee Period”).

7 The Firm seeks interim approval of its fees incurred and reimbursement of expenses during the
8 Interim Fee Period totaling **\$71,441.50** which sum represents compensation for advisory services rendered
9 in the amount of **\$71,110.00** and reimbursement for expenses incurred in the amount of **\$331.50**. The Firm
10 spent a total of 52.7 hours associated with the services provided to the Debtor during this Interim Fee
11 Period.

12 This Interim Application is based upon the contents hereof, together with the exhibits, the
13 declaration of Charles Moore filed concurrently herewith, the pleadings, papers, and records on file in this
14 case, and any evidence or argument that the Court may entertain at the time of the hearing on the Interim
15 Application. Summary charts detailing the amount of fees charged and hours worked by each of the
16 Firm’s professionals and paraprofessionals during the Interim Fee Period are attached hereto as **Exhibit**
17 **B** through **Exhibit E**.

18 **BACKGROUND**

19 **A. General Background**

20 On May 8, 2023 (the “Petition Date”), The Roman Catholic Bishop of Oakland, a California corporation
21 sole, and the debtor and debtor in possession (the “Debtor” or “RCBO”) commenced the above-captioned
22 chapter 11 bankruptcy case (the “Chapter 11 Case” or the “Bankruptcy Case”). The Debtor continues to
23 operate its ministry and manage its properties as a debtor in possession under sections 1107(a) and 1108
24 of the Bankruptcy Code. No trustee, examiner, or statutory committee has been appointed in this Chapter
25 11 Case.
26

27
28 ¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Compensation Procedures Order.

1 On May 23, 2023, the Office of the United States Trustee filed its notice of appointment of an
2 Official Committee of Unsecured Creditors [Dkt. No. 58].

3 **B. Employment of A&M**

4 Also on May 23, 2023, the Debtor filed the *Debtor's Application to Employ Alvarez & Marsal*
5 *North America, LLC as Restructuring Advisor To The Debtor Effective as of The Petition Date; and (II)*
6 *Granting Related Relief* [Dkt. No. 64] (the "Retention Application"). The Court approved the Retention
7 Application on July 1, 2023, entering the *Order Approving Debtor's Application of Alvarez & Marsal*
8 *North America, LLC as Restructuring Advisory to the Debtor* [Dkt. No. 191] (the "A&M Retention
9 Order"). A copy of the A&M Retention Order is attached hereto as **Exhibit A**.

10
11 **C. Present Posture of the Chapter 11 Case**

12 The Debtor has retained the following professionals in the case to date:

13 1. Foley & Lardner LLP ("Foley") as its General Bankruptcy Counsel, which was approved by
14 the Court pursuant to the Foley Retention Order.

15 2. The Debtor has also retained A&M as its restructuring advisor, which was approved by the
16 Court pursuant to the Order (I) Authorizing the Employment and Retention of Alvarez & Marsal North
17 America, LLC as Restructuring Advisor to the Debtor Effective as of the Petition Date; and (II) Granting
18 Related Relief [Dkt. No. 191].

19 3. The Debtor has retained KCC as its Claims and Noticing Agent, which was approved by the
20 Court pursuant to the Order (I) Authorizing and Approving the Retention of Kurtzman Carson
21 Consultants, LLC as Claims and Noticing Agent, and (II) Granting Related Relief [Dkt. No. 40]. The
22 Court has also approved the Debtor's retention of KCC as its Administrative Agent, pursuant to the Order
23 (I) Authorizing and Approving the Retention of Kurtzman Carson Consultants, LLC as Administrative
24 Advisor, and (II) Granting Related Relief [Dkt. No. 146].

25 4. The Debtor has retained Breall & Breall LLP ("Breall") as its Special Insurance Counsel, which
26 was approved by the Court pursuant to the Order Approving Debtor's Application to Employ Breall &
27 Breall LLP as Special Insurance Counsel Pursuant to 11 U.S.C. §§ 327(a), 330, 331, and 1107, and Rules
28 2014 and 2016 of the Federal Rules of Bankruptcy Procedure [Dkt. No. 376].

5. The Court also approved the Debtor's retention of certain Ordinary Course Professionals through its Order (I) Authorizing the Retention and Payment, Effective as of the Petition Date, of Professionals Utilized by the Debtor in the Ordinary Course of Business; and (II) Granting Related Relief [Dkt. No. 263] (the "OCP Order").

SERVICES RENDERED

In accordance with the *United States Bankruptcy Court Northern District of California Guidelines for Compensation and Expense Reimbursement of Professionals and Trustees* (the "Northern District Guidelines") and the Local Bankruptcy Rules for the Northern District of California (the "Local Rules"), A&M attempted to place the services performed in the category that best relates to the service provided. However, because certain services affected multiple categories, services pertaining to one category may occasionally be included in another category. The fact that similar services appear in several different categories did not result in any duplication of work or billing.

A&M has established the following billing categories in this case to for the current Interim Fee Period:

Task Name	Sum of Hours	Sum of Fees
COURT HEARINGS	7.8	11,895.00
FEE APP	8.1	3,657.50
LITIGATION	1.0	1,525.00
PLAN / DISCLOSURE STATEMENT	34.9	53,222.50
SOFA's	0.9	810.00
TOTAL:	52.7	\$ 71,110.00

Exhibit B includes A&M's filed invoices for the Interim Fee Period, which includes detailed breakdown of the time entries and expenses incurred.

A. Court Hearings

Total Hours 7.8/ Total Fees \$11,895.00

During the Interim Fee Period, A&M participated in hearings on the Disclosure Statement.

B. Fee App

Total Hours 8.1/ Total Fees \$3,657.50

During the Interim Fee Period, A&M, among other things, prepared its monthly fee statement cover letters and task code summaries for January 2025, February 2025, March 2025 and April 2025, along with its Fifth Interim Fee Application.

C. Litigation

Total Hours 1.0/ Total Fees \$1,525.00

During the Interim Fee Period, A&M worked with Foley and Vera Cruz to prepare responses and objections to motions filed by the UCC, including the filing of a declaration by Charles Moore.

D. Plan/Disclosure Statement

Total Hours 34.9/ Total Fees \$53,222.50

During the Interim Fee Period, A&M, among other things, prepared for and participated in strategy discussions regarding plan funding sources, financing options, and other assets to pay claims; worked with Foley and Vera Cruz to prepare exhibits to the Disclosure Statement; and provided input on the Plan of Reorganization and Disclosure Statement.

E. SOFA's

Total Hours .9/ Total Fees \$810.00

During the Interim Fee Period, A&M, among other things, assisted the Debtor with responding to questions from Foley related to owned property listed on the Schedule of Assets.

D. List of Expenses by Category

During the Interim Fee Period, A&M incurred a total of \$331.50 in expenses. A summary chart is listed below and additional details regarding the type and amount of expenses incurred during the Interim Fee Period is attached hereto as **Exhibit C**.

<i>Summary of Expenses</i>	
Expense Category	Sum of Expenses
Lodging	311.20
Telephone/Internet	20.30
TOTAL:	\$ 331.50

1 **E. Hourly Rates**

2 The hourly rates of all professionals and paraprofessionals rendering services in this case are set
3 forth on the Billing Summary Chart on **Exhibit D** annexed hereto.
4

5 **F. Client Review of Billing Statements**

6 Pursuant to the Northern District Guidelines, an email enclosing this Interim Application is being
7 sent to the Debtor concurrently. This email invites the Debtor to discuss with the Firm and/or the Office
8 of the United States Trustee any objections, concerns, or questions the Debtor may have with regard to
9 the requested compensation and reimbursement set forth in the Interim Application.

10 **G. Notice of Application and Hearing**

11 Notice of the submission of this Interim Application and the hearing thereon will be provided to
12 the Office of the United States Trustee, the Debtor, all parties requesting special notice and other interested
13 parties in accordance with the Bankruptcy Rules, Local Bankruptcy Rules, and any applicable orders of
14 the Court. Complete copies of the Interim Application will be promptly furnished to any other party upon
15 specific request. Therefore, notice should be deemed adequate under the circumstances and in accordance
16 with Federal Bankruptcy Rules 2002(a)(6) and 2002(c)(2). Additionally, this Interim Application is
17 available from the claims and noticing agent, KCC, at no charge.
18

19
20 **THE FEES AND EXPENSES REQUESTED SHOULD**

21 **BE AWARDED BASED UPON APPLICABLE LAW**

22 The fees and expenses requested by this Interim Application are an appropriate award for A&M
23 services in acting as restructuring advisor to the Debtor.

24 **A. Evaluation of Requests for Compensation**

25 Pursuant to section 330 of the Bankruptcy Code, the Court may award to a professional person
26 reasonable compensation for actual, necessary services rendered, and reimbursement for actual, necessary
27 expenses incurred. Pursuant to section 331 of the Bankruptcy Code, the Court may award interim
28 compensation and reimbursement to a professional. As set forth above, the fees for which the Firm

1 requests compensation and the costs incurred for which the Firm requests reimbursement are for actual
2 and necessary services rendered and costs incurred.

3 In determining the amount of allowable fees under section 330(a) of the Bankruptcy Code, courts
4 are to be guided by the same “general principles” as are to be applied in determining awards under the
5 federal fee-shifting statutes, with “some accommodation to the peculiarities of bankruptcy matters.”
6 *Burgess v. Klenske (In re Manoa Finance Co., Inc.)*, 853 F. 2d 687, 691 (9th Cir. 1988).

7 In assessing the propriety of an award of attorneys’ fees, twelve factors relevant to determining
8 such fees were identified in *Johnson v. Georgia Highway Express, Inc.*, 488 F. 2d 714, 717-719 (5th Cir.
9 1974), a Title VII class action case under the Civil Rights Act of 1964, 42 U. S. C. § 2000 et seq., and
10 *Kerr v. Screen Extras Guild, Inc.*, 526 F. 2d 67, 70 (9th Cir. 1975), cert. denied, 425 U. S. 951 (1976): (1)
11 the time and labor required, (2) the novelty and difficulty of the questions, (3) the skill requisite to perform
12 the service properly, (4) the preclusion of other employment by the professional due to acceptance of the
13 case, (5) the customary fee, (6) whether fee is fixed or contingent, (7) time limitations imposed by the
14 client or the circumstances, (8) the amount involved and the results obtained, (9) the experience,
15 reputation, and ability of the professionals, (10) the undesirability of the case, (11) the nature and length
16 of the professional relationship with the client, and (12) awards in similar cases. *See American Benefit*
17 *Life Ins. Co. v. Baddock (In re First Colonial Corp. of America)*, 544 F.2d 1291 (5th Cir. 1977) (*Johnson*
18 *criteria applicable in bankruptcy cases*).

19 The time for which compensation is sought is detailed in the Firm’s invoices for the Interim Fee
20 Period annexed hereto as Exhibit B. A&M’s services and time expenditures are reasonable in light of the
21 labor required and outcomes achieved to date in this case, particularly with respect to the filing of the Plan
22 and Disclosure Statement. The Firm’s charges for its professional services are based upon the time, nature,
23 extent, and value of such services and the cost of comparable services in the San Francisco area, other
24 than in a case under the Bankruptcy Code. The compensation the Firm seeks by way of this Interim
25 Application is the customary compensation commonly sought by the Firm and other professionals
26 representing trustees, committees, and debtors in similar circumstances.

1 **B. Section 330(a)(3) Factors**

2 Section 330(a)(3) of the Bankruptcy Code sets forth five factors to be considered by the Court.
3 Although several of these factors, such as the time involved and the timeliness of A&M's performance,
4 were addressed above, A&M believes two of the five factors should be discussed separately again here.

5 First, section 330(a)(3)(C) of the Bankruptcy Code requires that the professional services be
6 necessary to the administration of, or beneficial at the time at which the service was rendered toward
7 completion of, the case. A&M believes the facts of this case and the substantial progress that has occurred
8 to date demonstrate that A&M's services were both necessary and beneficial to the estate.

9 Second, section 330(a)(3)(E) of the Bankruptcy Code requires the compensation to be reasonable
10 based on customary compensation charged by comparably skilled practitioners in cases other than cases
11 under the Bankruptcy Code. A&M believes its advisors are skilled and have performed well in this case,
12 and that the fees charged by A&M are commensurate with the fees charged by A&M's counterparts.

13 **C. Available Funds**

14 A&M understands that the Debtor has sufficient funds available for the payment of fees and costs
15 requested herein.
16

17
18 **CONCLUSION**

19 A&M requests an interim allowance of all fees and costs for the Interim Fee Period. Neither A&M,
20 nor any advisors of the Firm, have any agreement or any understanding of any kind or nature to divide,
21 pay over, or share any portion of the fees to be awarded A&M with any other person or attorney, except
22 among members of the Firm.

23 A&M believes that the services rendered for which compensation is sought in this Interim
24 Application have been beneficial to the estates, that the costs incurred have been necessary and proper,
25 and that the sums requested for the services rendered and the costs incurred are fair and reasonable.

26 WHEREFORE, A&M respectfully requests that this Court (a) authorize interim allowance and
27 direct payment of fees and costs, (b) award interim compensation to the Firm in the amount of **\$71,441.50**
28 inclusive of all fees and costs for the period from January 1, 2025 through April 30, 2025, consisting of

1 **\$71,110.00** of fees and **\$331.50** of expenses, and (c) grant such other and further relief as may be
2 appropriate under the circumstances.

3
4 DATED: June 16, 2025

ALVAREZ & MARSAL NORTH AMERICA, LLC
755 W. Big Beaver
Troy, MI 48084

5
6 /s/ Charles M. Moore

Charles M. Moore

7 Managing Director

8 Alvarez & Marsal North America, LLC
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EXHIBIT A

A&M RETENTION ORDER

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The following constitutes the order of the Court.
Signed: July 1, 2023

William J. Lafferty, III
U.S. Bankruptcy Judge

*Counsel for the Debtor
and Debtor in Possession*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re:

THE ROMAN CATHOLIC BISHOP OF
OAKLAND, a California corporation sole,

Debtor.

Case No. 23-40523 WJL

Chapter 11

**ORDER (I) AUTHORIZING THE
EMPLOYMENT AND RETENTION OF
ALVAREZ & MARSAL NORTH AMERICA,
LLC AS RESTRUCTURING ADVISOR TO
THE DEBTOR EFFECTIVE AS OF TO THE
PETITION DATE; AND (II) GRANTING
RELATED RELIEF**

Upon the application (the "Application")¹ filed by The Roman Catholic Bishop of Oakland, a California corporation sole, and the debtor and debtor in possession (the "Debtor" or "RCBO") in the above-captioned chapter 11 bankruptcy case (the "Chapter 11 Case" or the "Bankruptcy Case"), pursuant to sections 105(a), 327(a), 328, and 1107(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and Local Rules 2014-1 and 2016-1 of the Local Bankruptcy Rules for the Northern District of California,

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Application.

Oakland Division (the “Local Rules”) for the entry of an order (a) authorizing the employment and retention of Alvarez & Marsal North America, LLC, together with employees of its affiliates (all of which are wholly owned by its parent company and employees), its wholly owned subsidiaries, and independent contractors (collectively, “A&M”) as restructuring advisor to the Debtor in the Chapter 11 Case, pursuant to the engagement agreement attached to the Application as **Exhibit C** (the “Engagement Agreement”), dated as of January 19, 2023, effective as of the Petition Date, and (b) granting related relief, all as more fully set forth in the Application; and upon the Moore Declaration submitted in support of the Application; and this Court having reviewed the Application, the First Day Declaration, the Moore Declaration, and the supplemental declaration of Charles M. Moore filed as ECF No. 154 (the “Supplemental Declaration”); and this Court having found that (a) this Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and that this is a core proceeding pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b) and the *Order Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order No. 24 (N.D. Cal.), and Rule 5011-1(a) of the Local Rules; (b) venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and (c) due and proper notice of the Application was sufficient under the circumstances; and this Court having determined that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and it appearing that the relief requested in the Application is in the best interests of the Debtor, its estate, creditors, and other parties-in-interest; and upon all of the proceedings had before this Court and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Application is APPROVED as set forth in this Order.
2. The Debtor is authorized to retain A&M as restructuring advisor, effective as of the Petition Date, under the terms set forth in the Engagement Agreement, and A&M is authorized and directed to perform the services described in the Engagement Agreement and Application.
3. A&M shall be compensated in accordance with, and will file, monthly, interim, and final fee applications for allowance of its compensation and expenses and shall be subject to sections 330 and

331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, the Fee and Expense Guidelines, any applicable United States Trustee guidelines, and any orders of this Court.

4. The indemnification, contribution, and reimbursement provisions set forth in the Engagement Agreement, as modified by the Application and this Order, are approved, subject, during the pendency of the Chapter 11 Case, to the following:

All requests by A&M for payment of indemnity pursuant to the Engagement Agreement shall be made by means of an application (interim or final as the case may be) and shall be subject to review by the Court to ensure that payment of such indemnity conforms to the terms of the Engagement Agreement and is reasonable based upon the circumstances of the litigation or settlement in respect of which indemnity is sought, *provided, however*, that in no event shall A&M be indemnified to the extent a court determines by final order that any claim or expense has resulted from the bad faith, self-dealing, breach of fiduciary duty (if any), gross negligence, or willful misconduct on the part of A&M.

5. Notwithstanding anything to the contrary in the Engagement Letter, the Application, or the Moore Declaration, or the Supplemental Declaration, the indemnification provisions are hereby modified as follows:

- a. A&M shall not be entitled to indemnification, contribution or reimbursement pursuant to the Engagement Letter for services, unless such services and the indemnification, contribution or reimbursement therefore are approved by the Court;
- b. the Debtor shall have no obligation to indemnify A&M, or provide contribution or reimbursement to A&M, for any claim or expense that is either: (i) judicially determined (the determination having become final) to have arisen from A&M's gross negligence, willful misconduct, breach of fiduciary duty, if any, bad faith or self-dealing; (ii) for a contractual dispute in which the Debtor alleges the breach of A&M contractual obligations unless the Court determines that indemnification, contribution or reimbursement would be permissible pursuant to *In re United Artists Theatre Co.*, 315 F.3d 217 (3d Cir. 2003); or (iii) settled prior to a judicial determination as to A&M's gross negligence, willful misconduct, breach of fiduciary duty, or bad faith or self-dealing but determined by this Court, after notice and a hearing to be a claim or expense for which A&M should not receive indemnity, contribution or reimbursement under the terms of the Agreement as modified by the Application and this Order; and
- c. before the earlier of (i) the entry of an order confirming a chapter 11 plan in this Chapter 11 Case (that order having become a final order no longer subject to

1 appeal), and (ii) the entry of an order closing this Chapter 11 Case, A&M believes
2 that it is entitled to the payment of any amounts by the Debtor on account of the
3 Debtor's indemnification, contribution and/or reimbursement obligations under the
4 Engagement Letter (as modified by the Application and this Order), including
5 without limitation the advancement of defense costs, A&M must file an application
6 therefore in this Court, and the Debtor may not pay any such amounts to A&M
7 before the entry of an order by this Court approving the payment. This
8 subparagraph (c) is intended only to specify the period of time under which the
9 Court shall have jurisdiction over any request for fees and expenses by A&M for
10 indemnification, contribution or reimbursement and not a provision limiting the
11 duration of the Debtor's obligation to indemnify A&M. All parties in interest shall
12 retain the right to object to any demand by A&M for indemnification, contribution
13 or reimbursement.

14 6. For services rendered during this Chapter 11 Case, the following language in the
15 indemnification and limitation on liability agreement ("Indemnity Agreement") attached to the
16 Engagement Letter shall be of no force and effect: (1) in clause (A) of the Indemnity Agreement:
17 "in no event will any Indemnified Party have any liability to the Company for special,
18 consequential, incidental or exemplary damages or loss (nor any lost profits, savings or business
19 opportunity)" and (2) in clause (D) of the Indemnity Agreement: "; and further provided that in
20 no event will the Indemnified Parties' aggregate contribution for all losses, claims, damages,
21 liabilities, and expenses with respect to which contribution is available hereunder exceed the
22 amount of fees actually received by the Indemnification Parties pursuant to the Agreement."

23 7. During the course of this Chapter 11 Case, the following sentence set forth in Paragraph 9
24 of the Engagement Letter shall have no force or effect: "The Firm will not be prevented or restricted by
25 virtue of providing the Services from providing services to other entities or individuals, including
26 entities or individuals whose interests may be in competition or conflict with the Company's, provided
27 the Firm makes appropriate arrangements to ensure that the confidentiality of information is
28 maintained."

8. During the course of the bankruptcy case, any provision in the Engagement Letter requiring
the payment of a percentage of fees to cover any type of cost or expense shall have no force or effect.

9. Notwithstanding anything to the contrary in the Application, any of its attachments, or any
engagement letter, A&M shall not seek reimbursement of any fees or costs arising from the prosecution

1 or defense of any of A&M's monthly fee statements or fee applications in this Chapter 11 Case.

2 10. Notwithstanding any provision in the Engagement Letter to the contrary, the
3 Court shall have exclusive jurisdiction over A&M's engagement during pendency of this Chapter 11
4 Case.

5 11. Notwithstanding anything to the contrary in the Engagement Letter, during this Chapter 11
6 Case, A&M is being retained solely by the Debtor and not by any of the Debtor's other professionals.
7 Only the Debtor shall have the ability to terminate A&M's retention in this Chapter 11 Case.

8 12. In the event of any inconsistency between the Engagement Agreement, the Application,
9 and this Order, this Order shall govern.

10 13. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be
11 immediately effective and enforceable immediately upon its entry.

12 14. The Debtor is authorized and empowered to take all action necessary to effectuate the relief
13 granted in this Order.

14 15. This Court shall retain jurisdiction with respect to all matters arising from or related to the
15 implementation, interpretation, or enforcement of this Order.

16 **APPROVED AS TO FORM:**

17 OFFICE OF THE UNITED STATES TRUSTEE

18 By: /s/ Jason Blumberg
19 Jason Blumberg
Trial Attorney

20 *** END OF ORDER ***

COURT SERVICE LIST

All ECF Recipients.

EXHIBIT B

JANUARY 1, 2025 – APRIL 30, 2025 FEE APPLICATIONS FILED

FOLEY & LARDNER LLP

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555 California Street, Suite 1700

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*Counsel for the Debtor
and Debtor in Possession*

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

In re:

THE ROMAN CATHOLIC BISHOP OF
OAKLAND, a California corporation sole,

Debtor.

Case No. 23-40523 WJL

Chapter 11

**TWENTIETH MONTHLY FEE STATEMENT
OF ALVAREZ & MARSAL NORTH
AMERICA, LLC FOR PAYMENT OF FEES
AND REIMBURSEMENT OF EXPENSES
INCURRED FROM JANUARY 1, 2025
THROUGH FEBRUARY 28, 2025**

Judge: Hon. William J. Lafferty

**Objection Deadline: April 10, 2025
4:00 p.m. (Pacific Time)**

[No Hearing Requested]

Name of Applicant:	Alvarez & Marsal North America, LLC
Authorized to Provide Professional Services to:	Debtor
Date of Retention:	Effective as of May 8, 2023 by Order entered July 1, 2023 [Dkt No. 191]
Period for Which Compensation and Reimbursement is Sought:	January 1, 2025 through February 28, 2025
Amount of Compensation Requested:	\$45,622.50
20% Holdback:	\$9,124.50
Amount of Expenses Requested:	\$318.07
Total Compensation (Net of Holdback) and Expense Reimbursement Requested:	\$36,816.07

Pursuant to sections 327(e) and 328(a) of Chapter 11 of Title 11 of the United States Code, Rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure, the *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt. No. 0170] (the “Monthly Compensation Order”), and the *Order (I) Authorizing The Employment and Retention of Alvarez & Marsal North America, LLC as Restructuring Advisor To The Debtor Effective as of The Petition Date; and (II) Granting Related Relief* [Dkt. No. 191] (the “Retention Order”), Alvarez & Marsal North America, LLC (“A&M” or “Applicant”), as restructuring advisor to the Debtor, hereby submits this statement (the “Fee Statement”) seeking compensation for services rendered and reimbursement of expenses incurred as restructuring advisor to the debtor and debtor in possession in the above-captioned chapter 11 case (the “Debtor”), for the period from January 1, 2025 through February 28, 2025 (the “Fee Period”). By this Twentieth statement, A&M seeks payment in the amount of \$36,816.07 which comprises (i) eighty percent (80%) of the total amount of compensation sought for actual and necessary services rendered during the Fee Period, and (ii) reimbursement of one hundred percent (100%) of actual and necessary expenses incurred in connection with such services. As described in more detail in the Retention Order, the compensation sought herein is comprised of the services provided to the Debtor based on hourly rates.

Attached hereto as **Exhibit A** is a summary of A&M’s professionals by individual, setting forth the (a) name and title of each individual who provided services during the Fee Period, (b) aggregate hours spent by each individual, (c) hourly billing rate for each such individual, and (d) amount of fees earned by each A&M professional during the Fee Period. Attached hereto as **Exhibit B** is a summary of the services rendered and compensation sought by task category during the Fee Period. Attached as **Exhibit C**, are

TWENTIETH MONTHLY FEE STATEMENT OF ALVAREZ & MARSAL NORTH AMERICA, LLC

records of A&M's fees incurred by task category during the period January 1, 2025 through February 28, 2025, consisting of contemporaneously maintained time entries for each professional in increments of tenths (1/10) of an hour. Also attached hereto as **Exhibit D** is a summary of expenses incurred and reimbursement sought, by expense category, during the Fee Period. Finally, attached hereto as **Exhibit E** is the expense detail by category of expenses incurred during the Fee Period.

In accordance with the Compensation Procedures Order, each Notice Party shall have until the tenth (10th) day (or the next business day if such day is not a business day) following service of this Monthly Fee Statement (the "**Objection Deadline**") to serve an objection to the Monthly Fee Statement on A&M and each of the other Notice Parties.

Upon the expiration of the Objection Deadline, the Applicant shall file a certificate of no objection with the Court, after which the Debtor is authorized and directed to pay the Applicant an amount equal to 80% of the fees and 100% of the expenses requested in this Monthly Fee Statement.

If an objection is properly filed, the Debtor shall be authorized and directed to pay the Applicant 80% of the fees and 100% of the expenses not subject to an objection.

NOTICE OF CUSTOMARY RATE INCREASES

As disclosed in the Debtor's Application for an Order Authorizing its Retention and Employment of Alvarez and Marsal, Nunc Pro Tunc to the Petition Date (Docket # 19), Alvarez and Marsal's hourly billing rates are subject to periodic review and adjustments. Alvarez & Marsal's practice of periodically adjusting its billing rates was disclosed to the Debtor in Alvarez & Marsal's engagement letter, and the Debtor has agreed to pay these modified rates pursuant to the engagement letter.

In accordance with ordinary practice and as described in the Alvarez and Marsal Retention Application, Alvarez and Marsal has changed certain of its billing rates effective as of January 1, 2025. Alvarez and Marsal's hourly billing rates effective as of January 1, 2025, are as follows:

Billing Category U.S. Range

Managing Directors	\$1,100 - \$1,575
Directors	\$850 - \$1,110
Associates / Managers	\$625 - \$825
Analysts	\$450 - \$600
Paraprofessionals	\$325 - \$375

DATED: March 31, 2025

Alvarez & Marsal North America, LLC
755 W. Big Beaver, Suite 650
Troy, MI 48084

/s/ Charles M. Moore

Charles M. Moore
Managing Director
Alvarez & Marsal North America, LLC

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Exhibit A
Summary of Fees and Hours by Professionals
For the Period January 1, 2025 through February 28, 2025

***The Roman Catholic Bishop of Oakland
Summary of Fees and Hours by Professional
January 1, 2025 through February 28, 2025***

<i>Professional</i>	<i>Position</i>	<i>Billing Rate</i>	<i>Sum of Hours</i>	<i>Sum of Fees</i>
Charles Moore	Managing Director	\$1,525.00	28.7	\$43,767.50
Natalie Corbett	Paraprofessional	\$350.00	5.3	\$1,855.00
		<i>Total</i>	34.0	\$45,622.50

Exhibit B
Summary of Total Fees by Task Category
For the Period January 1, 2025 through February 28, 2025

***The Roman Catholic Bishop of Oakland
Summary of Time Detail by Task
January 1, 2025 through February 28, 2025***

<i>Task Description</i>	<i>Sum of Hours</i>	<i>Sum of Fees</i>
COURT HEARINGS	2.7	\$4,117.50
FEE APP	6.0	\$2,922.50
LITIGATION	0.5	\$762.50
PLAN / DISCLOSURE STATEMENT	24.8	\$37,820.00
	<i>Total</i>	<i>\$45,622.50</i>

Exhibit C
Time Detail by Task by Professional
For the Period January 1, 2025 through February 28, 2025

***The Roman Catholic Bishop of Oakland
Time Detail by Task Category
January 1, 2025 through February 28, 2025***

COURT HEARINGS

Professional	Date	Hours	Activity
Charles Moore	1/8/2025	1.1	Partial participation as declarant in hearing regarding UCC's motions related to lift stay and prosecute claims.
Charles Moore	1/16/2025	1.6	Partial participation in hearing on UCC motion related to OPF and Disclosure Statement

Subtotal **2.7**

FEE APP

Professional	Date	Hours	Activity
Natalie Corbett	1/27/2025	1.9	Preparation of December cover sheet
Natalie Corbett	2/4/2025	2.4	Preparation of cover sheet for 5th interim
Charles Moore	2/12/2025	0.7	Work on cover sheet for Fifth Interim Fee Application
Natalie Corbett	2/14/2025	1.0	Finalize coversheet for 5th interim fee application

Subtotal **6.0**

LITIGATION

Professional	Date	Hours	Activity
Charles Moore	1/6/2025	0.5	Review pleadings filed by UCC in response to objections related to OPF and insurance.

Subtotal **0.5**

PLAN / DISCLOSURE STATEMENT

Professional	Date	Hours	Activity
Charles Moore	1/3/2025	1.1	Review and comment on draft amended Plan of Reorganization, Disclosure Statement and Liquidation Analysis
Charles Moore	1/11/2025	0.8	Review UCC objection to Amended Disclosure Statement.
Charles Moore	1/13/2025	0.4	Review correspondence from Foley regarding update on motions brought by UCC and continued disclosure statement hearing
Charles Moore	1/22/2025	0.3	Review updates from Foley on hearing related to Disclosure Statement and OPF claim, including next steps on liquidation analysis
Charles Moore	1/23/2025	0.8	Call with A. Uetz (Foley) to debrief on disclosure statement hearings and discuss activities to complete.
Charles Moore	1/28/2025	0.4	Review correspondence from Foley and Vera Cruz related to additional liquidation analysis scenario and provide commentary regarding same
Charles Moore	1/31/2025	0.3	Review update from Foley on disclosure statement, updates to be made and new timeline agreed to with UCC

***The Roman Catholic Bishop of Oakland
Time Detail by Task Category
January 1, 2025 through February 28, 2025***

PLAN / DISCLOSURE STATEMENT

Professional	Date	Hours	Activity
Charles Moore	2/12/2025	1.9	Meeting with RCBO management, M. Kemner, Foley (A. Uetz, M. Lee, S. Moses) and Vera Cruz (C. de Quesada, D. Flanagan) to discuss Plan strategies, assets available for distribution and preparation for mediation.
Charles Moore	2/14/2025	0.4	Review open items and correspondence from Foley regarding plan for updating Disclosure Statement
Charles Moore	2/17/2025	0.2	Review update from Foley regarding status of amended Disclosure Statement
Charles Moore	2/17/2025	0.7	Review previous liquidation analysis and prepare recommendations for update to amended Disclosure Statement.
Charles Moore	2/17/2025	0.3	Correspondence with Foley regarding potential updates to liquidation analysis
Charles Moore	2/18/2025	0.5	Call with A. Uetz (Foley) regarding updates to Plan and Disclosure Statement
Charles Moore	2/18/2025	0.4	Prepare information related to potential updates to liquidation analysis and distribute to Foley
Charles Moore	2/19/2025	1.6	Call with M. Lee, S. Moses (Foley), C. De Quesada, D. Flanagan (Vera Cruz) and A. Zimmerman and C. Parthum (Hilco) to discuss liquidation analysis for Disclosure Statement
Charles Moore	2/19/2025	1.0	Review Second Amended Plan of Reorganization and Second Amended Disclosure Statement
Charles Moore	2/20/2025	0.2	Call with M. Lee (Foley) regarding liquidation analysis.
Charles Moore	2/20/2025	1.1	Work on updated draft of liquidation analysis.
Charles Moore	2/21/2025	0.6	Further work on liquidation analysis
Charles Moore	2/21/2025	0.2	Review comments on liquidation analysis from Foley
Charles Moore	2/21/2025	0.3	Call with M. Lee (Foley) regarding liquidation analysis.
Charles Moore	2/21/2025	0.3	Further updates to liquidation analysis and distribute draft to Foley
Charles Moore	2/21/2025	0.4	Review and analyze real estate information from Hilco
Charles Moore	2/21/2025	0.5	Prepare correspondence for Foley regarding liquidation analysis
Charles Moore	2/21/2025	0.8	Call with D. Flanagan (Vera Cruz) regarding vacant properties
Charles Moore	2/21/2025	0.3	Correspondence with Foley regarding open items and questions on liquidation analysis
Charles Moore	2/21/2025	0.2	Call with M. Lee (Foley) regarding information needed for liquidation analysis
Charles Moore	2/21/2025	1.5	Work on updated liquidation analysis

***The Roman Catholic Bishop of Oakland
Time Detail by Task Category
January 1, 2025 through February 28, 2025***

PLAN / DISCLOSURE STATEMENT

Professional	Date	Hours	Activity
Charles Moore	2/21/2025	0.4	Correspondence with Foley regarding timing for liquidation analysis update
Charles Moore	2/22/2025	2.0	Work on updates to draft liquidation analysis and supplemental liquidation analysis
Charles Moore	2/22/2025	0.4	Call with M. Lee (Foley) regarding property information and comments on liquidation analysis
Charles Moore	2/22/2025	0.8	Review, analyze and comment on additional information from Foley for liquidation analysis
Charles Moore	2/22/2025	0.3	Review updated property information from Foley for liquidation analysis
Charles Moore	2/23/2025	0.5	Further edits to liquidation analysis
Charles Moore	2/23/2025	0.3	Call with Shane Moses (Foley) regarding liquidation analysis
Charles Moore	2/23/2025	1.5	Prepare edits to liquidation analysis
Charles Moore	2/23/2025	0.4	Review additional edits from Foley to liquidation analysis and finalize liquidation analysis
Charles Moore	2/23/2025	0.2	Review proposed edits from Foley to liquidation analysis
Charles Moore	2/25/2025	0.5	Review information from Foley regarding mediation item and prepare response.
Subtotal		24.8	
Grand Total		34.0	

Exhibit D
Summary of Expenses
For the Period January 1, 2025 through February 28, 2025

*The Roman Catholic Bishop of Oakland
Summary of Expense Detail by Category
January 1, 2025 through February 28, 2025*

<i><u>Expense Category</u></i>	<i><u>Sum of Expenses</u></i>
Lodging	\$311.20
telephone/internet	\$6.87
	<i><u>Total</u></i>
	<u><u>\$318.07</u></u>

Exhibit E
Expense Detail by Category
For the Period January 1, 2025 through February 28, 2025

*The Roman Catholic Bishop of Oakland
Expense Detail by Category
January 1, 2025 through February 28, 2025*

Lodging

Professional/Service	Date	Expense	Expense Description
Charles Moore	1/15/2025	\$311.20	Hotel in CA - Night of 1/15
Expense Category Total		\$311.20	

telephone/internet

Professional/Service	Date	Expense	Expense Description
Charles Moore	1/12/2025	\$4.42	Wireless Usage Charges
Natalie Corbett	1/12/2025	\$0.48	Wireless Usage Charges
Natalie Corbett	1/12/2025	\$0.36	Wireless Usage Charges
Charles Moore	2/12/2025	\$1.61	Wireless Usage Charges
Expense Category Total		\$6.87	
<i>Grand Total</i>		<u>\$318.07</u>	

FOLEY & LARDNER LLP

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Matthew D. Lee (admitted *pro hac vice*)

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555 California Street, Suite 1700

San Francisco, CA 94104-1520

*Counsel for the Debtor
and Debtor in Possession*

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

In re:

THE ROMAN CATHOLIC BISHOP OF
OAKLAND, a California corporation sole,

Debtor.

Case No. 23-40523 WJL

Chapter 11

**TWENTY-FIRST MONTHLY FEE
STATEMENT OF ALVAREZ & MARSAL
NORTH AMERICA, LLC FOR PAYMENT OF
FEES AND REIMBURSEMENT OF
EXPENSES INCURRED FROM MARCH 1,
2025 THROUGH APRIL 30, 2025**

Judge: Hon. William J. Lafferty

**Objection Deadline: June 9, 2025
4:00 p.m. (Pacific Time)**

[No Hearing Requested]

Name of Applicant:	Alvarez & Marsal North America, LLC
Authorized to Provide Professional Services to:	Debtor
Date of Retention:	Effective as of May 8, 2023 by Order entered July 1, 2023 [Dkt No. 191]
Period for Which Compensation and Reimbursement is Sought:	March 1, 2025 through April 30, 2025
Amount of Compensation Requested:	\$25,487.50
20% Holdback:	\$5,097.50
Amount of Expenses Requested:	\$13.43
Total Compensation (Net of Holdback) and Expense Reimbursement Requested:	\$20,403.43

Pursuant to sections 327(e) and 328(a) of Chapter 11 of Title 11 of the United States Code, Rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure, the *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Dkt. No. 0170] (the “Monthly Compensation Order”), and the *Order (I) Authorizing The Employment and Retention of Alvarez & Marsal North America, LLC as Restructuring Advisor To The Debtor Effective as of The Petition Date; and (II) Granting Related Relief* [Dkt. No. 191] (the “Retention Order”), Alvarez & Marsal North America, LLC (“A&M” or “Applicant”), as restructuring advisor to the Debtor, hereby submits this statement (the “Fee Statement”) seeking compensation for services rendered and reimbursement of expenses incurred as restructuring advisor to the debtor and debtor in possession in the above-captioned chapter 11 case (the “Debtor”), for the period from March 1, 2025 through April 30, 2025 (the “Fee Period”). By this Twenty-First statement, A&M seeks payment in the amount of \$20,403.43 which comprises (i) eighty percent (80%) of the total amount of compensation sought for actual and necessary services rendered during the Fee Period, and (ii) reimbursement of one hundred percent (100%) of actual and necessary expenses incurred in connection with such services. As described in more detail in the Retention Order, the compensation sought herein is comprised of the services provided to the Debtor based on hourly rates.

Attached hereto as **Exhibit A** is a summary of A&M’s professionals by individual, setting forth the (a) name and title of each individual who provided services during the Fee Period, (b) aggregate hours spent by each individual, (c) hourly billing rate for each such individual, and (d) amount of fees earned by each A&M professional during the Fee Period. Attached hereto as **Exhibit B** is a summary of the services rendered and compensation sought by task category during the Fee Period. Attached as **Exhibit C**, are

TWENTY-FIRST MONTHLY FEE STATEMENT OF ALVAREZ & MARSAL NORTH AMERICA, LLC

1 records of A&M's fees incurred by task category during the period March 1, 2025 through April 30, 2025,
2 consisting of contemporaneously maintained time entries for each professional in increments of tenths
3 (1/10) of an hour. Also attached hereto as **Exhibit D** is a summary of expenses incurred and reimbursement
4 sought, by expense category, during the Fee Period. Finally, attached hereto as **Exhibit E** is the expense
5 detail by category of expenses incurred during the Fee Period.

6 In accordance with the Compensation Procedures Order, each Notice Party shall have until the
7 tenth (10th) day (or the next business day if such day is not a business day) following service of this
8 Monthly Fee Statement (the "**Objection Deadline**") to serve an objection to the Monthly Fee Statement on
9 A&M and each of the other Notice Parties.

10 Upon the expiration of the Objection Deadline, the Applicant shall file a certificate of no objection
11 with the Court, after which the Debtor is authorized and directed to pay the Applicant an amount equal to
12 80% of the fees and 100% of the expenses requested in this Monthly Fee Statement.

13 If an objection is properly filed, the Debtor shall be authorized and directed to pay the Applicant
14 80% of the fees and 100% of the expenses not subject to an objection.

15
16
17 DATED: May 30, 2025

Alvarez & Marsal North America, LLC
755 W. Big Beaver, Suite 650
Troy, MI 48084

19 /s/ Charles M. Moore
20 Charles M. Moore
21 Managing Director
Alvarez & Marsal North America, LLC

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Exhibit A
Summary of Fees and Hours by Professionals
For the Period March 1, 2025 through April 30, 2025

***The Roman Catholic Bishop of Oakland
Summary of Fees and Hours by Professional
March 1, 2025 through April 30, 2025***

<i>Professional</i>	<i>Position</i>	<i>Billing Rate</i>	<i>Sum of Hours</i>	<i>Sum of Fees</i>
Charles Moore	Managing Director	\$1,525.00	15.7	\$23,942.50
Robert Country	Director	\$900.00	0.9	\$810.00
Natalie Corbett	Paraprofessional	\$350.00	2.1	\$735.00
		<i>Total</i>	18.7	\$25,487.50

Exhibit B
Summary of Total Fees by Task Category
For the Period March 1, 2025 through April 30, 2025

***The Roman Catholic Bishop of Oakland
Summary of Time Detail by Task
March 1, 2025 through April 30, 2025***

<i>Task Description</i>	<i>Sum of Hours</i>	<i>Sum of Fees</i>
COURT HEARINGS	5.1	\$7,777.50
FEE APP	2.1	\$735.00
LITIGATION	0.5	\$762.50
PLAN / DISCLOSURE STATEMENT	10.1	\$15,402.50
SOFA's	0.9	\$810.00
	<i>Total</i>	<i>\$25,487.50</i>

Exhibit C
Time Detail by Task by Professional
For the Period March 1, 2025 through April 30, 2025

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***The Roman Catholic Bishop of Oakland
Time Detail by Task Category
March 1, 2025 through April 30, 2025***

COURT HEARINGS

Professional	Date	Hours	Activity
Charles Moore	4/1/2025	0.3	Participate virtually in second session of hearing on disclosure statement
Charles Moore	4/1/2025	1.0	Participate virtually in first session of hearing on disclosure statement
Charles Moore	4/1/2025	0.7	Participate virtually in third session of hearing on disclosure statement
Charles Moore	4/1/2025	2.0	Participate virtually in delayed start of hearing on disclosure statement
Charles Moore	4/3/2025	0.4	Participate virtually in continued hearing on Disclosure Statement
Charles Moore	4/30/2025	0.7	Participate virtually in hearing related to Fifth Interim Fee Applications
Subtotal		5.1	

FEE APP

Professional	Date	Hours	Activity
Natalie Corbett	3/24/2025	2.1	Preparation of January-February combined cover sheet
Subtotal		2.1	

LITIGATION

Professional	Date	Hours	Activity
Charles Moore	4/7/2025	0.5	Review correspondence from Foley regarding Judge's order related to OPF and review Order
Subtotal		0.5	

PLAN / DISCLOSURE STATEMENT

Professional	Date	Hours	Activity
Charles Moore	3/10/2025	0.4	Call with M. Lee (Foley) regarding questions on liquidation analysis
Charles Moore	3/10/2025	0.2	Correspondence with A. Uetz (Foley) regarding liquidation analysis
Charles Moore	3/13/2025	0.3	Review correspondence from Foley regarding Third Amended Plan and Disclosure Statement
Charles Moore	3/14/2025	0.4	Correspondence with Foley regarding items to consider on further amended Plan and liquidation analysis
Charles Moore	3/15/2025	3.2	Work on updated liquidation analysis for third amended Plan
Charles Moore	3/17/2025	0.2	Correspondence with M. Lee (Foley) regarding finalization of liquidation analysis
Charles Moore	3/18/2025	0.8	Review Third Amended Plan and Disclosure Statement

***The Roman Catholic Bishop of Oakland
Time Detail by Task Category
March 1, 2025 through April 30, 2025***

PLAN / DISCLOSURE STATEMENT

Professional	Date	Hours	Activity
Charles Moore	3/18/2025	0.5	Review Supplement to Motion to Approve Disclosure Statement
Charles Moore	3/25/2025	0.7	Review UCC objection to third amended disclosure statement
Charles Moore	3/28/2025	0.7	Review Debtor reply to UCC objection to Third Amended Disclosure Statement
Charles Moore	4/1/2025	0.4	Correspondence with A. Uetz (Foley) regarding dates for discovery and confirmation hearing
Charles Moore	4/3/2025	0.2	Correspondence with A. Uetz (Foley) regarding approval of Disclosure Statement and next steps
Charles Moore	4/3/2025	0.3	Review updated filing with proposed revisions to Disclosure Statement and solicitation materials
Charles Moore	4/16/2025	0.4	Review correspondence from Foley regarding discovery from UCC, timeline and activities leading up to confirmation hearing
Charles Moore	4/21/2025	0.3	Review correspondence from Foley related to UCC discovery requests related to Plan confirmation hearing and sources of funds for Plan
Charles Moore	4/22/2025	0.5	Partial participation in call with Foley (M. Lee, S. Moses, G. Goodman, J. Thomas), VeraCruz (D. Flanagan), and A&M (C. Moore, S. Levitt) regarding the restricted cash analysis ahead of the Plan confirmation hearing.
Charles Moore	4/30/2025	0.2	Call with D. Flanagan (Vera Cruz) to discuss observations on Plan funding sources
Charles Moore	4/30/2025	0.4	Review and provide comments to D. Flanagan (Vera Cruz) related to Plan funding analysis

Subtotal **10.1**

SOFAs

Professional	Date	Hours	Activity
Robert Country	4/25/2025	0.9	Review property data to respond to inquiry from counsel re: owned real property listed on the Schedules of Assets.

Subtotal **0.9**

Grand Total **18.7**

Exhibit D
Summary of Expenses
For the Period March 1, 2025 through April 30, 2025

*The Roman Catholic Bishop of Oakland
Summary of Expense Detail by Category
March 1, 2025 through April 30, 2025*

<i><u>Expense Category</u></i>	<i><u>Sum of Expenses</u></i>
telephone/internet	\$13.43
	<i><u>Total</u></i>
	<u><u>\$13.43</u></u>

Exhibit E
Expense Detail by Category
For the Period March 1, 2025 through April 30, 2025

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*The Roman Catholic Bishop of Oakland
Expense Detail by Category
March 1, 2025 through April 30, 2025*

telephone/internet

Professional/Service	Date	Expense	Expense Description
Charles Moore	3/31/2025	\$7.45	Wireless Usage Charges
Natalie Corbett	3/31/2025	\$1.20	Wireless Usage Charges
Charles Moore	4/30/2025	\$4.78	Wireless Usage Charges
Expense Category Total		\$13.43	
<i>Grand Total</i>		<u>\$13.43</u>	

EXHIBIT C

EXPENSE DETAIL BY CATEGORY

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***The Roman Catholic Bishop of Oakland
Expense Detail by Category
January 1, 2025 through April 30, 2025***

Lodging

Professional/Service	Date	Expense	Expense Description
Charles Moore	1/15/2025	\$311.20	Hotel in CA - Night of 1/15
Expense Category Total		\$311.20	

telephone/internet

Professional/Service	Date	Expense	Expense Description
Charles Moore	1/12/2025	\$4.42	Wireless Usage Charges
Natalie Corbett	1/12/2025	\$0.48	Wireless Usage Charges
Natalie Corbett	1/12/2025	\$0.36	Wireless Usage Charges
Charles Moore	2/12/2025	\$1.61	Wireless Usage Charges
Charles Moore	3/31/2025	\$7.45	Wireless Usage Charges
Natalie Corbett	3/31/2025	\$1.20	Wireless Usage Charges
Charles Moore	4/30/2025	\$4.78	Wireless Usage Charges
Expense Category Total		\$20.30	
<i>Grand Total</i>		<u>\$331.50</u>	

EXHIBIT D

SUMMARY OF FEES AND HOURS BY PROFESSIONALS

*The Roman Catholic Bishop of Oakland
Summary of Time Detail by Professional
January 1, 2025 through April 30, 2025*

<i>Professional</i>	<i>Position</i>	<i>Billing Rate</i>	<i>Sum of Hours</i>	<i>Sum of Fees</i>
Charles Moore	Managing Director	\$1,525.00	44.4	\$67,710.00
Robert Country	Director	\$900.00	0.9	\$810.00
Natalie Corbett	Paraprofessional	\$350.00	7.4	\$2,590.00
		<i>Total</i>	52.7	\$71,110.00

EXHIBIT E
TIME DETAIL BY TASK

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***The Roman Catholic Bishop of Oakland
Time Detail by Activity
January 1, 2025 through April 30, 2025***

COURT HEARINGS

Professional	Date	Hours	Activity
Charles Moore	1/8/2025	1.1	Partial participation as declarant in hearing regarding UCC's motions related to lift stay and prosecute claims.
Charles Moore	1/16/2025	1.6	Partial participation in hearing on UCC motion related to OPF and Disclosure Statement
Charles Moore	4/1/2025	0.7	Participate virtually in third session of hearing on disclosure statement
Charles Moore	4/1/2025	2.0	Participate virtually in delayed start of hearing on disclosure statement
Charles Moore	4/1/2025	1.0	Participate virtually in first session of hearing on disclosure statement
Charles Moore	4/1/2025	0.3	Participate virtually in second session of hearing on disclosure statement
Charles Moore	4/3/2025	0.4	Participate virtually in continued hearing on Disclosure Statement
Charles Moore	4/30/2025	0.7	Participate virtually in hearing related to Fifth Interim Fee Applications
Subtotal		7.8	

FEE APP

Professional	Date	Hours	Activity
Natalie Corbett	1/27/2025	1.9	Preparation of December cover sheet
Natalie Corbett	2/4/2025	2.4	Preparation of cover sheet for 5th interim
Charles Moore	2/12/2025	0.7	Work on cover sheet for Fifth Interim Fee Application
Natalie Corbett	2/14/2025	1.0	Finalize coversheet for 5th interim fee application
Natalie Corbett	3/24/2025	2.1	Preparation of January-February combined cover sheet
Subtotal		8.1	

LITIGATION

Professional	Date	Hours	Activity
Charles Moore	1/6/2025	0.5	Review pleadings filed by UCC in response to objections related to OPF and insurance.
Charles Moore	4/7/2025	0.5	Review correspondence from Foley regarding Judge's order related to OPF and review Order
Subtotal		1.0	

PLAN / DISCLOSURE STATEMENT

Professional	Date	Hours	Activity
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***The Roman Catholic Bishop of Oakland
Time Detail by Activity
January 1, 2025 through April 30, 2025***

PLAN / DISCLOSURE STATEMENT

Professional	Date	Hours	Activity
Charles Moore	1/3/2025	1.1	Review and comment on draft amended Plan of Reorganization, Disclosure Statement and Liquidation Analysis
Charles Moore	1/11/2025	0.8	Review UCC objection to Amended Disclosure Statement.
Charles Moore	1/13/2025	0.4	Review correspondence from Foley regarding update on motions brought by UCC and continued disclosure statement hearing
Charles Moore	1/22/2025	0.3	Review updates from Foley on hearing related to Disclosure Statement and OPF claim, including next steps on liquidation analysis
Charles Moore	1/23/2025	0.8	Call with A. Uetz (Foley) to debrief on disclosure statement hearings and discuss activities to complete.
Charles Moore	1/28/2025	0.4	Review correspondence from Foley and Vera Cruz related to additional liquidation analysis scenario and provide commentary regarding same
Charles Moore	1/31/2025	0.3	Review update from Foley on disclosure statement, updates to be made and new timeline agreed to with UCC
Charles Moore	2/12/2025	1.9	Meeting with RCBO management, M. Kemner, Foley (A. Uetz, M. Lee, S. Moses) and Vera Cruz (C. de Quesada, D. Flanagan) to discuss Plan strategies, assets available for distribution and preparation for mediation.
Charles Moore	2/14/2025	0.4	Review open items and correspondence from Foley regarding plan for updating Disclosure Statement
Charles Moore	2/17/2025	0.2	Review update from Foley regarding status of amended Disclosure Statement
Charles Moore	2/17/2025	0.7	Review previous liquidation analysis and prepare recommendations for update to amended Disclosure Statement.
Charles Moore	2/17/2025	0.3	Correspondence with Foley regarding potential updates to liquidation analysis
Charles Moore	2/18/2025	0.5	Call with A. Uetz (Foley) regarding updates to Plan and Disclosure Statement
Charles Moore	2/18/2025	0.4	Prepare information related to potential updates to liquidation analysis and distribute to Foley
Charles Moore	2/19/2025	1.6	Call with M. Lee, S. Moses (Foley), C. De Quesada, D. Flanagan (Vera Cruz) and A. Zimmerman and C. Parthum (Hilco) to discuss liquidation analysis for Disclosure Statement
Charles Moore	2/19/2025	1.0	Review Second Amended Plan of Reorganization and Second Amended Disclosure Statement
Charles Moore	2/20/2025	0.2	Call with M. Lee (Foley) regarding liquidation analysis.
Charles Moore	2/20/2025	1.1	Work on updated draft of liquidation analysis.
Charles Moore	2/21/2025	0.2	Call with M. Lee (Foley) regarding information needed for liquidation analysis
Charles Moore	2/21/2025	0.5	Prepare correspondence for Foley regarding liquidation analysis
Charles Moore	2/21/2025	0.4	Review and analyze real estate information from Hilco

***The Roman Catholic Bishop of Oakland
Time Detail by Activity
January 1, 2025 through April 30, 2025***

PLAN / DISCLOSURE STATEMENT

Professional	Date	Hours	Activity
Charles Moore	2/21/2025	0.8	Call with D. Flanagan (Vera Cruz) regarding vacant properties
Charles Moore	2/21/2025	0.3	Correspondence with Foley regarding open items and questions on liquidation analysis
Charles Moore	2/21/2025	0.6	Further work on liquidation analysis
Charles Moore	2/21/2025	0.3	Call with M. Lee (Foley) regarding liquidation analysis.
Charles Moore	2/21/2025	0.2	Review comments on liquidation analysis from Foley
Charles Moore	2/21/2025	0.4	Correspondence with Foley regarding timing for liquidation analysis update
Charles Moore	2/21/2025	0.3	Further updates to liquidation analysis and distribute draft to Foley
Charles Moore	2/21/2025	1.5	Work on updated liquidation analysis
Charles Moore	2/22/2025	0.8	Review, analyze and comment on additional information from Foley for liquidation analysis
Charles Moore	2/22/2025	0.4	Call with M. Lee (Foley) regarding property information and comments on liquidation analysis
Charles Moore	2/22/2025	2.0	Work on updates to draft liquidation analysis and supplemental liquidation analysis
Charles Moore	2/22/2025	0.3	Review updated property information from Foley for liquidation analysis
Charles Moore	2/23/2025	0.5	Further edits to liquidation analysis
Charles Moore	2/23/2025	0.3	Call with Shane Moses (Foley) regarding liquidation analysis
Charles Moore	2/23/2025	1.5	Prepare edits to liquidation analysis
Charles Moore	2/23/2025	0.4	Review additional edits from Foley to liquidation analysis and finalize liquidation analysis
Charles Moore	2/23/2025	0.2	Review proposed edits from Foley to liquidation analysis
Charles Moore	2/25/2025	0.5	Review information from Foley regarding mediation item and prepare response.
Charles Moore	3/10/2025	0.4	Call with M. Lee (Foley) regarding questions on liquidation analysis
Charles Moore	3/10/2025	0.2	Correspondence with A. Uetz (Foley) regarding liquidation analysis
Charles Moore	3/13/2025	0.3	Review correspondence from Foley regarding Third Amended Plan and Disclosure Statement
Charles Moore	3/14/2025	0.4	Correspondence with Foley regarding items to consider on further amended Plan and liquidation analysis

***The Roman Catholic Bishop of Oakland
Time Detail by Activity
January 1, 2025 through April 30, 2025***

PLAN / DISCLOSURE STATEMENT

Professional	Date	Hours	Activity
Charles Moore	3/15/2025	3.2	Work on updated liquidation analysis for third amended Plan
Charles Moore	3/17/2025	0.2	Correspondence with M. Lee (Foley) regarding finalization of liquidation analysis
Charles Moore	3/18/2025	0.8	Review Third Amended Plan and Disclosure Statement
Charles Moore	3/18/2025	0.5	Review Supplement to Motion to Approve Disclosure Statement
Charles Moore	3/25/2025	0.7	Review UCC objection to third amended disclosure statement
Charles Moore	3/28/2025	0.7	Review Debtor reply to UCC objection to Third Amended Disclosure Statement
Charles Moore	4/1/2025	0.4	Correspondence with A. Uetz (Foley) regarding dates for discovery and confirmation hearing
Charles Moore	4/3/2025	0.2	Correspondence with A. Uetz (Foley) regarding approval of Disclosure Statement and next steps
Charles Moore	4/3/2025	0.3	Review updated filing with proposed revisions to Disclosure Statement and solicitation materials
Charles Moore	4/16/2025	0.4	Review correspondence from Foley regarding discovery from UCC, timeline and activities leading up to confirmation hearing
Charles Moore	4/21/2025	0.3	Review correspondence from Foley related to UCC discovery requests related to Plan confirmation hearing and sources of funds for Plan
Charles Moore	4/22/2025	0.5	Partial participation in call with Foley (M. Lee, S. Moses, G. Goodman, J. Thomas), VeraCruz (D. Flanagan), and A&M (C. Moore, S. Levitt) regarding the restricted cash analysis ahead of the Plan confirmation hearing.
Charles Moore	4/30/2025	0.4	Review and provide comments to D. Flanagan (Vera Cruz) related to Plan funding analysis
Charles Moore	4/30/2025	0.2	Call with D. Flanagan (Vera Cruz) to discuss observations on Plan funding sources

Subtotal **34.9**

SOFAs

Professional	Date	Hours	Activity
Robert Country	4/25/2025	0.9	Review property data to respond to inquiry from counsel re: owned real property listed on the Schedules of Assets.

Subtotal **0.9**

Grand Total **52.7**